

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division
In Admiralty**

SATIRA SHIPPING COMPANY LIMITED,

Plaintiff,

v.

GLOBAL AMERICAN TRANSPORT LLC,

Defendant,

and

BANK OF AMERICA, N.A.,

Garnishee.

Civil Action No. 3:24-cv-00443

Garnishee, Bank of America, N.A. (the “Bank of America” and/or “Garnishee”), by counsel and pursuant to Rule B of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure (“Rule B”), hereby submits its Answer to the Writ for Maritime Attachment and Garnishment and to the Verified Complaint as follows:

**GARNISHEE BANK OF AMERICA, N.A.’S ANSWER TO
WRIT FOR MARITIME ATTACHMENT AND GARNISHMENT**

1. On June 24, 2024, this Court issued a Writ for Maritime Attachment and Garnishment based upon the Verified Complaint for Breach of Contract filed by Plaintiff Satira Shipping Company Limited (“Plaintiff”) against Global American Transport LLC (“Defendant”).

2. Bank of America does not have possession, custody, or control of any tangible or intangible property of Global American Transport LLC comprised of debts, credits, or effects including but not limited to: bank accounts, checks, payments made to, held or which may be

receivable by, Bank of America on behalf of Global American Transport LLC, monies, disbursement advances, payments for goods or other services, documents of title, shares of stock or other financial instruments and any other funds, collateral or property of any kind belonging to claimed by or held for the benefit of the Global American Transport LLC, either located and to be found at Bank of America 1111 Main Street, Richmond, VA 23219 or otherwise within the Eastern District of Virginia.

3. Bank of America attaches the Declaration of **CHANEL COOPER** in support hereof.

4. Bank of America prays that it be discharged and dismissed from this case.

**GARNISHEE BANK OF AMERICA, N.A.'S ANSWER TO
PLAINTIFF'S VERIFIED COMPLAINT**

THE PARTIES

1. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 1 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

2. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 2 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

3. Bank of America admits that it is a national banking association authorized to do business in the state of Virginia with an office located at 100 N. Tryon St, Charlotte, NC, 28202-2135 and a business address located at 1111 E. Main Street, Richmond VA 2319. Bank of America denies that it has possession, custody, or control of assets belonging to Defendant either located and to be found at Bank of America 1111 Main Street, Richmond, VA 23219 or otherwise within the Eastern District of Virginia. The remaining allegations in Paragraph 3 of the Complaint contain

statements and conclusions of law, to which no response is required. To the extent the remaining allegations are contrary to the law, they are denied.

SUBJECT MATTER JURISDICTION

4. The allegations in Paragraph 4 of the Complaint contain statements and conclusions of law, to which no response is required. To the extent the allegations are contrary to the law, they are denied.

FACTUAL BACKGROUND

5. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 5 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

6. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 6 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

7. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 7 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

8. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 8 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

9. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 9 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

10. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 10 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

11. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 11 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

12. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 12 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

13. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 13 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

14. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 14 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

15. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 15 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

16. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 16 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

17. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 17 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

18. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 18 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

19. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 19 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

20. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 20 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

21. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 21 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

22. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 22 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

23. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 23 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

24. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 24 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

25. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 25 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

26. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 26 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

27. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 27 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

BREACH OF MARITIME CONTRACT

28. Bank of America incorporates and re-asserts the responses contained in the foregoing paragraphs as if fully stated herein.

29. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 29 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

30. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 30 of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

31. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 31 and the following subparts (A) through (D) of the Complaint as they pertain to a party other than Bank of America and therefore denies same.

CLAIM FOR RULE B ATTACHMENT

32. Bank of America incorporates and re-asserts the responses contained in the foregoing paragraphs as if fully stated herein.

33. Paragraph 33 of the Complaint contains a general description of the Complaint to which no response is required. To the extent a response is required, Bank of America denies the allegations.

34. Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth in Paragraph 34 the Complaint as they pertain to a party other than Bank of America and therefore denies same.

35. The allegations in Paragraph 35 of the Complaint are denied.

36. The allegations in Paragraph 36 of the Complaint are denied.

37. Paragraph 37 of the Complaint contains a general description of the Complaint to which no response is required. To the extent a response is required, the allegations are denied.

Bank of America specifically denies the allegations set forth in the unnumbered “WHEREFORE” paragraph following Paragraph 37 of the Complaint, including subparts (A) through (E) thereof, in any way relating to Bank of America. As to any remaining allegations, Bank of America is without information sufficient to form a belief about the truth and falsity of the allegations set forth and therefore denies same.

Bank of America denies any and all allegations contained in the headings and/or unnumbered paragraphs in the Complaint.

Bank of America denies, generally and specifically, any and all allegations in the Complaint not specifically admitted in the paragraphs above.

Bank of America further states that its investigation of the present matter is ongoing. Accordingly, Bank of America reserves the right to amend this Answer.

WHEREFORE, Garnishee Bank of America, N.A., respectfully requests that the Writ for Attachment be vacated, that it be dismissed from the case, and that the Court takes no further action against Bank of America, and for such other and further relief as this Court deems appropriate and just.

July 15, 2024

GARNISHEE BANK OF AMERICA, N.A.

By: /s/ Ethan G. Ostroff

Ethan G. Ostroff (VSB No. 71610)
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Counsel for Garnishee Bank of America, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2024, I electronically filed the foregoing *Bank of America, N.A.'s Answer to Plaintiff's Verified Complaint* document with the Clerk of Court using CM/ECF. I further certify that a copy of the foregoing document was mailed to:

Registered Agent, Gebremeskel Tekla
2035 W Granville Ave, Apt 406
Chicago, IL 60659-3034

Dated: July 15, 2024

Respectfully Submitted,

/s/ Ethan G. Ostroff
Ethan G. Ostroff